

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

CASSANDRA HOUSE,

Plaintiff,

vs.

SYNCHRONY BANK  
and EQUIFAX INFORMATION  
SERVICES, LLC,

Defendants.

Case No.: \_\_\_\_\_

**Removed from the Sixteenth Judicial  
Circuit, Circuit Court for the County of  
Macomb, Michigan  
Case No. 24-003364-CZ**

**NOTICE OF REMOVAL**

Defendant Synchrony Bank (“Synchrony”), by counsel, pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, hereby notices removal of the state-court civil action known as *Cassandra House v. Synchrony Bank, et al.*, from the Sixteenth Judicial Circuit, Circuit Court for the County of Macomb, Michigan, to the United States District Court for the Eastern District of Michigan, and in support thereof states as follows:

**PROCEDURAL HISTORY**

1. This action is being removed to federal court based on federal question jurisdiction.
2. On or about August 28, 2024, Plaintiff Cassandra House (“Plaintiff”) filed her Complaint in the Sixteenth Judicial Circuit, Circuit Court for the County of Macomb, Michigan (the “State Court Action”). A true and correct copy of the Complaint is attached hereto as **Exhibit A**.
3. The Complaint was served on Synchrony on September 17, 2024. A true and correct copy of the Summons as to Synchrony is attached hereto as **Exhibit B**.

4. As set forth more fully below, this case is properly removed to this Court pursuant to 28 U.S.C. § 1441 because Synchrony has satisfied the procedural requirements for removal and this Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331.

### **GROUND FOR REMOVAL**

#### **I. Synchrony Has Satisfied The Procedural Requirements For Removal.**

5. Synchrony was served with the Complaint on September 17, 2024. Therefore, under 28 U.S.C. § 1446(b), this Notice of Removal is timely as it was filed within the 30-day deadline. The Complaint was the first pleading, notice, order or other paper from which it could be ascertained that this lawsuit was removable to Federal Court.

6. Concurrently with the filing of this Notice of Removal, Synchrony is giving written notice of removal to Plaintiff (by serving Plaintiff with a copy of this Notice of Removal, together with all exhibits) and by filing a copy of this Notice of Removal with the Clerk of the State Court pursuant to 28 U.S.C. § 1446(d). A copy of the State Court Notice of Filing of Notice of Removal, without its exhibits, is attached hereto as **Exhibit C**.

7. Counsel for Defendant Equifax Information Services, LLC (“Equifax”) has not yet filed an Appearance in this lawsuit or Equifax’s initial responsive pleadings to the Complaint.

#### **II. Removal Is Proper Because This Court Has Subject Matter Jurisdiction.**

8. United States District Courts are vested with jurisdiction to consider cases or controversies “arising under” the laws of the United States of America. *See* 28 U.S.C. § 1331.

9. Removal of such cases is governed by 28 U.S.C. § 1441(a). Section 1441(a) provides that “any civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the defendant or the defendants, to the district

court of the United States for the district and division embracing the place where such action is pending.” *See* 28 U.S.C. § 1441(a).

10. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, because this matter involves a federal question. Namely, Plaintiff’s Complaint asserts a claim against Synchrony for alleged violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.* (the “FCRA”). *See* Complaint, ¶ 1.

11. Plaintiff’s Complaint alleges violations of a federal statute—the FCRA—and consequently the claims “arise[] under” the laws of the United States. *See* 28 U.S.C. § 1331. Therefore, this Court may properly exercise jurisdiction over Plaintiff’s claims.

12. Synchrony has not attempted to remove this Complaint previously.

13. Given that the requirements for federal question are satisfied, this Complaint is properly removed.

14. Venue lies with this Court because the State Court Action is pending in the Sixteenth Judicial Circuit, Circuit Court for the County of Macomb, Michigan, which is within the Eastern District of Michigan. *See* 28 U.S.C. §§ 1441 and 1446(a).

WHEREFORE, Defendant Synchrony Bank, by counsel, respectfully removes this action from the Sixteenth Judicial Circuit, Circuit Court for the County of Macomb, Michigan to this Court pursuant to 28 U.S.C. §§ 1441 and 1446, and requests that this Court retain jurisdiction for

all further proceedings in this matter.

Dated: October 1, 2024

BY: /s/ Alan J. Taylor  
Alan J. Taylor (P51660)  
SEGAL MCCAMBRIDGE SINGER & MAHONEY  
Attorney for Defendant Synchrony Bank  
29100 Northwestern Hwy., Ste. 240  
Southfield, MI 48034  
(248) 994-0063/ (248) 994-0061 [Fax]  
ataylor@smsm.com  
**ATTORNEY FOR DEFENDANT  
SYNCHRONY BANK**

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

CASSANDRA HOUSE,

Plaintiff,

vs.

SYNCHRONY BANK  
and EQUIFAX INFORMATION  
SERVICES, LLC,

Defendants.

Case No.: \_\_\_\_\_

Removed from the Sixteenth Judicial  
Circuit, Circuit Court for the County of  
Macomb, Michigan  
Case No. 24-003364-CZ

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 1, 2024, a true and correct copy of the foregoing

**NOTICE OF REMOVAL** was filed electronically with the Court's CM/ECF system and served

via first class U.S. Mail; and via e-mail on :

Jennifer Paillon, Esq.  
Law Offices of Robert S. Gitmeid & Associates, PLLC  
30790 Valley Drive  
Farmington Hills, MI 48334  
Email: [Jennifer.P@gitmeidlaw.com](mailto:Jennifer.P@gitmeidlaw.com)

/s/ Grayce Trevino

# EXHIBIT A

FILED by Macomb County Circuit Court  
8/28/2024

2024-003364-CZ  
HOUSE, CASSANDRA VS. SYNCHRONY BANK ET AL.

STATE OF MICHIGAN  
SIXTEENTH JUDICIAL CIRCUIT  
IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

CASSANDRA HOUSE,  
  
Plaintiff,

Case No.: 24 -003364-CZ

Hon. James M. Biernat, Jr.

vs.

SYNCHRONY BANK  
and EQUIFAX INFORMATION  
SERVICES, LLC,

Defendants.

\_\_\_\_\_/

Jennifer Paillon, Esq. (P80284)  
LAW OFFICES OF ROBERT S. GITMEID  
& ASSOCIATES, PLLC  
30790 Valley Drive  
Farmington Hills, MI 48334  
Tel: (734) 904-9522  
Fax: (734) 547-6166  
Email: Jennifer.P@gitmeidlaw.com  
*Attorneys for Plaintiff Cassandra House*

\_\_\_\_\_/

COMPLAINT

There is no other civil action between these parties arising out of the same transaction or occurrence as alleged in this Complaint pending in this Court, nor has any such action been previously filed and dismissed or transferred after having been assigned to a judge.

\_\_\_\_\_

NOW COMES Plaintiff, Cassandra House (hereinafter "Plaintiff"), by and through her attorneys, the Law Offices of Robert S. Gitmeid & Associates, PLLC, by way of Complaint against Defendants, Synchrony Bank (hereinafter "SYNCB") and Equifax Information Services, LLC (hereinafter "Equifax") (collectively "Defendants"), and hereby alleges as follows:



### INTRODUCTION

1. This is an action for damages brought by an individual consumer for Defendants' violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq. (hereinafter "FCRA") and other claims related to unlawful credit reporting practices. The FCRA prohibits credit furnishers and consumer reporting agencies (hereinafter "CRA" or "CRAs") from falsely and inaccurately reporting consumers' credit information.

### PARTIES

2. Plaintiff is an adult citizen of the State of Michigan, domiciled in Warren, Macomb County, Michigan.
3. Plaintiff is a "consumer" as defined by 15 U.S.C. § 1681a(c) of the FCRA.
4. SYNCB is a national financial services company and "furnisher" of consumer credit information as that term is used in 15 U.S.C. § 1681s-2 of the FCRA.
5. SYNCB is qualified to do business in the State of Michigan and regularly conducts business in the State of Michigan.
6. Equifax is a limited liability company that engages in the business of maintaining and reporting consumer credit information. Equifax is a "consumer reporting agency" as defined by 15 U.S.C. § 1681a(f) of the FCRA.
7. Equifax is qualified to do business in the State of Michigan and regularly conducts business in the State of Michigan. Equifax is one the largest CRAs in the world.



**JURISDICTION AND VENUE**

8. Jurisdiction is proper in this Court pursuant to MCL § 600.605 as the amount in controversy in this action exceeds \$25,000.00 and is otherwise within this Court's subject matter jurisdiction.
9. Venue is proper in this Court pursuant to MCL § 600.1621 as Plaintiff is domiciled in Macomb County, Michigan; Defendants conduct business in Macomb County, Michigan; and the wrongful acts complained of herein occurred in whole or in part within the confines of Macomb County, Michigan.

**FACTUAL ALLEGATIONS**

10. SYNCB issued a credit account ending in 2896 to Plaintiff. The account was routinely reported on Plaintiff's consumer credit report.
11. The consumer credit report at issue is a written communication of information concerning Plaintiff's credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living which is used for the purpose of serving as a factor in establishing the consumer's eligibility for credit to be used primarily for personal, family, or household purposes as defined by 15 U.S.C. § 1681a(d)(1) of the FCRA.
12. On or about February 23, 2023, Plaintiff and SYNCB entered into a settlement agreement for the above-referenced account. A recording of the settlement agreement is available upon your request.
13. Pursuant to the terms of the settlement, Plaintiff was required to make monthly payments totaling \$697.41 to settle and close her SYNCB account.
14. Plaintiff, via her debt settlement representative, timely made the requisite settlement payments.

15. However, over half a year later, Plaintiff's SYNCB account continued to be negatively reported.
16. In particular, on a requested credit report dated April 19, 2024, Plaintiff's SYNCB account was reported with a status of "Collection/Charge-off," a balance of \$852.00, and an amount past due of \$852.00. The relevant portion of Plaintiff's April 2024 credit report is attached hereto as Exhibit A.
17. This tradeline was inaccurately reported. As evidenced by the enclosed settlement documents and information, the account was settled for less than full balance and must be reported as settled with a balance of \$0.00.
18. On or about May 22, 2024, Plaintiff, via counsel, notified the national CRAs directly of a dispute with completeness and/or accuracy of the reporting of Plaintiff's SYNCB account. A copy of Plaintiff's dispute letter is attached hereto as Exhibit B.
19. Therefore, Plaintiff disputed the accuracy of the derogatory and inaccurate information reported by SYNCB to the national CRAs, including Equifax, via certified mail in accordance with 15 U.S.C. § 1681i of the FCRA.
20. In July 2024, Plaintiff requested an updated credit report for review. The tradeline for Plaintiff's SYNCB account remained inaccurate as Defendants failed to correct the inaccuracy. The relevant portion of Plaintiff's July 2024 credit report is attached hereto as Exhibit C.
21. Upon information and belief, neither Equifax nor any other CRA notified SYNCB of Plaintiff's dispute in accordance with the FCRA. Alternatively, Equifax or another CRA did notify SYNCB of Plaintiff's dispute, but Defendants failed to properly investigate and delete the tradeline at issue or

failed to properly update the tradeline on Plaintiff's credit reports.

22. If SYNCB had performed a reasonable investigation of Plaintiff's dispute, Plaintiff's SYNCB account would have been updated to reflect a settled status with a balance of \$0.00.

23. Despite the fact that SYNCB has promised through its subscriber agreements and/or contracts to accurately update accounts, SYNCB has nonetheless willfully, maliciously, recklessly, wantonly, and/or negligently failed to follow this requirement, as well as the requirements set forth under the FCRA, which has resulted in the inaccurate and detrimental information remaining on Plaintiff's credit report.

24. Defendants failed to properly maintain and failed to follow reasonable procedures to assure maximum possible accuracy of Plaintiff's credit information and credit reports, concerning the SYNCB account in question, thus violating the FCRA. These violations occurred before, during, and after the dispute process began.

25. At all times pertinent hereto, Defendants were acting by and through their agents, servants, and/or employees, who were acting within the scope and course of their employment, and under the direct supervision and control of the Defendants herein.

26. At all times pertinent hereto, the conduct of Defendants, as well as that of their agents, servants, and/or employees, was malicious, intentional, willful, reckless, negligent, and/or in wanton disregard for federal law and the rights of the Plaintiff herein.

**CAUSE OF ACTION**

**FAIR CREDIT REPORTING ACT**

27. Plaintiff reasserts and incorporates herein by reference all facts and allegations set forth above.
28. Equifax is a "consumer reporting agency," as codified at 15 U.S.C. § 1681a(f).
29. SYNCB is an entity that, regularly and in the course of business, furnishes information to one or more CRAs about its transactions and/or experiences with any consumer and therefore constitutes a "furnisher," as codified at 15 U.S.C. § 1681s-2.
30. SYNCB is reporting inaccurate credit information concerning Plaintiff to one or more CRAs as defined by 15 U.S.C. § 1681a of the FCRA.
31. Plaintiff notified the national CRAs directly, including Equifax, of a dispute on the subject account's completeness and/or accuracy, as reported.
32. SYNCB failed to complete an investigation of Plaintiff's written dispute and provide the results of an investigation to Plaintiff and/or the CRAs within the 30-day statutory period as required by 15 U.S.C. § 1681s-2(b).
33. SYNCB failed to promptly correct the inaccurate information on Plaintiff's credit report in violation of 15 U.S.C. § 1681s-2(b).
34. SYNCB failed to promptly correct Plaintiff's inaccurate credit information with all CRAs in violation of 15 U.S.C. § 1681s-2(b)(1)(D).
35. Equifax failed to delete information found to be inaccurate, reinserted the information without following the FCRA, and/or failed to properly investigate Plaintiff's dispute.
36. Equifax failed to maintain and failed to follow reasonable procedures to assure maximum possible accuracy of Plaintiff's credit report, concerning the SYNCB



account in question, thus violating 15 U.S.C. § 1681e(b).

37. As a result of the above violations of the FCRA, Plaintiff suffered actual damages in one or more of the following categories: lower credit score, lower credit capacity, denial of credit, embarrassment and emotional distress caused by the inability to obtain financing for everyday expenses, increased interest rates, and other damages that may be ascertained at a later date.

38. As a result of the above violations of the FCRA, Defendants are liable to Plaintiff for actual damages, punitive damages, statutory damages, attorneys' fees, and costs.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that judgment be entered against Defendants as follows:

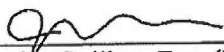
1. That judgment be entered against Defendants for actual damages pursuant to 15 U.S.C. § 1681n, or alternatively, 15 U.S.C. § 1681o;
2. That judgment be entered against Defendants for statutory damages pursuant to 15 U.S.C. § 1681n;
3. That judgment be entered against Defendants for punitive damages pursuant to 15 U.S.C. § 1681n;
4. That the Court award costs and reasonable attorneys' fees pursuant to 15 U.S.C. § 1681n, or alternatively, 15 U.S.C. § 1681o;
5. That the Court grant such other and further relief as may be just and proper.

#### **DEMAND FOR JURY TRIAL**

Pursuant to Mich. Ct. R. 2.508, Plaintiff demands a trial by jury in this action of all issues so triable.

Dated: August 8, 2024  
Farmington Hills, MI

**Law Offices of Robert S. Gitmeid & Associates, PLLC**

  
\_\_\_\_\_  
Jennifer Paillon, Esq. (P80284)  
30790 Valley Drive  
Farmington Hills, MI 48334  
Tel: (734) 904-9522  
Fax: (734) 547-6166  
Email: Jennifer.P@gitmeidlaw.com  
*Attorneys for Plaintiff Cassandra House*

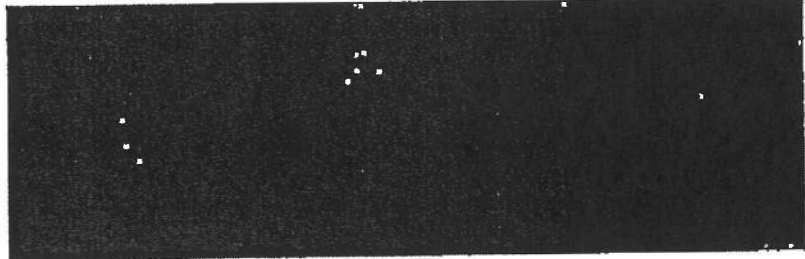
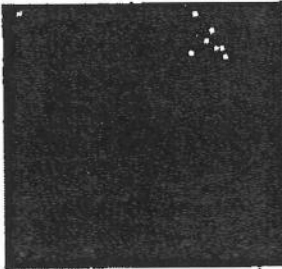
# EXHIBIT A



## Credit report

Provided by **EXLIFIN**

Report date: Apr 19, 2024



## Personal Info

Reported names

Cassandra House

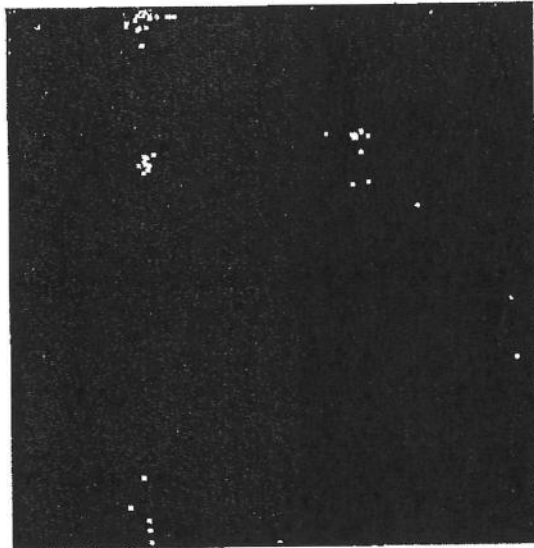
Addresses

Date reported

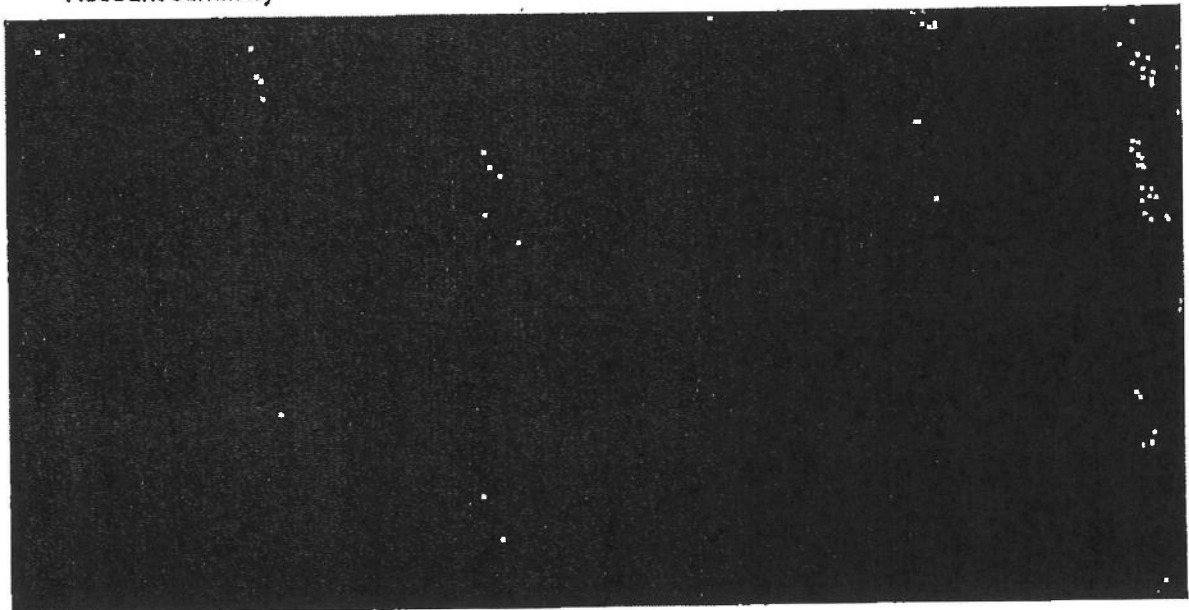
DOB

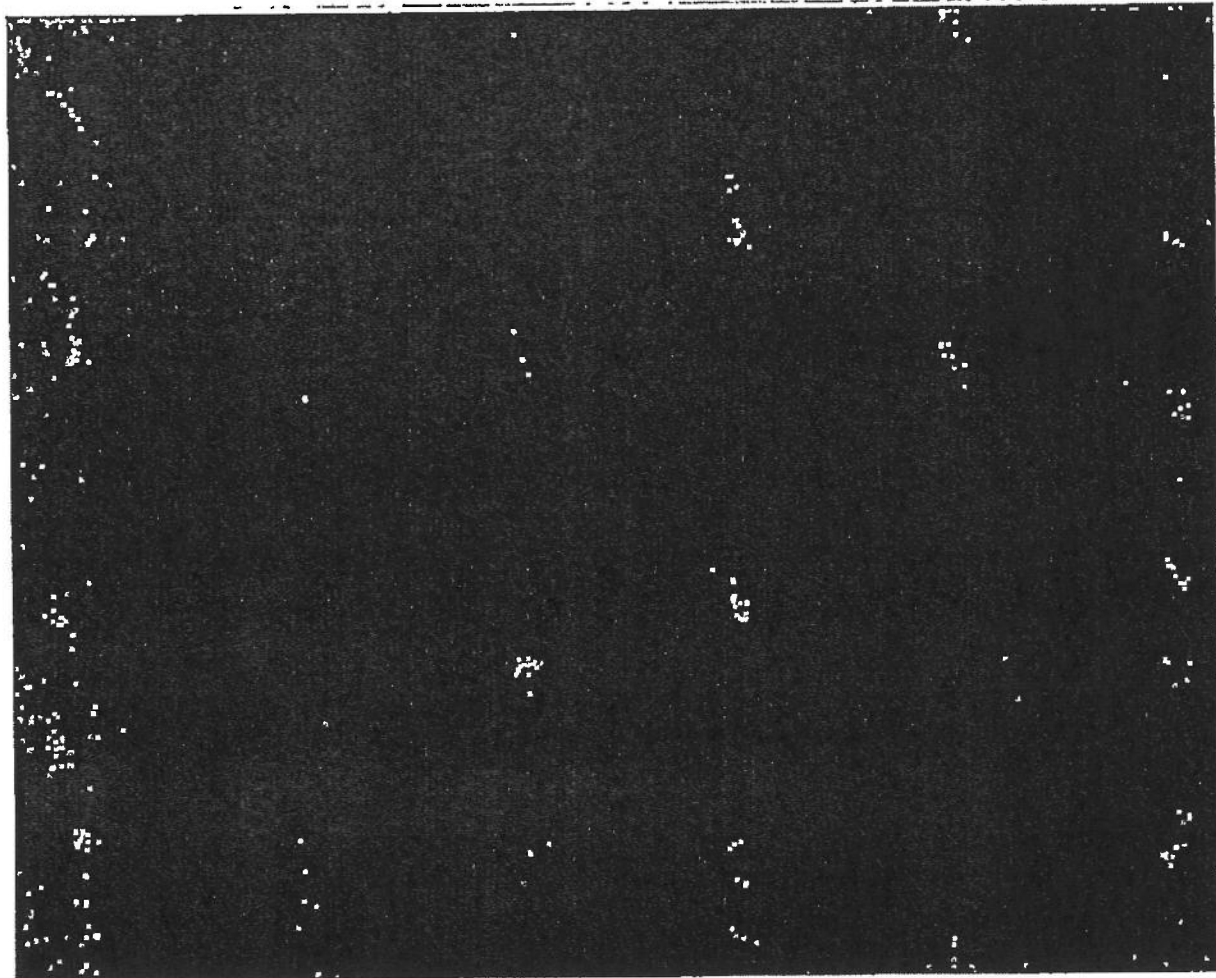
SSN

Employment Info



## Account summary





SVNCS/SAHIS CLUB  
Reported 10/01/2024

\$852.00  
Closed

Account details

Account Number

Account Status

Charge Off

Open Date

Last Activity

Charge Account

Type

Individual

Responsibility

Remarks Account Closed At Consumer's Request, Charged Off Account

Times 30/60/90 Days Late

11/13

Months Reviewed

40

Term Source Type

High Balance

High Credit

\$1,200.00

Creditor Information

SVNCS/SAHIS CLUB

4125 YMHAD PLAZA

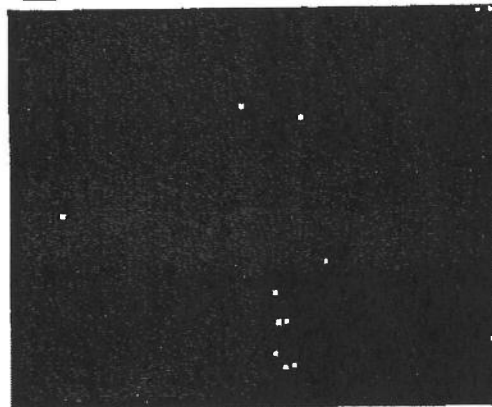
ALPHARETTA, GA 30005

MAIL ONLY

Overview

Balance \$852.00

Payment History



Monthly Payment Amount

Current Payment Status

Collection/Charge-off  
\$852.00

Amount Past Due

# EXHIBIT B



The Law Offices of  
ROBERT S. GITMEID & ASSOC., PLLC

May 22, 2024

VIA CERTIFIED MAIL

Transunion Consumer Solutions  
P.O. Box 2000  
Chester, PA 19016

Equifax Information Services, LLC  
P.O. Box 740256  
Atlanta, GA 30374

Experian  
P.O. Box 4500  
Allen, TX 75013

Re:	Cassandra House
Creditor:	Synchrony Bank d/b/a Sams Club
Account No.:	Ending in 2896
SSN:	Ending in [REDACTED]
Address:	[REDACTED]

Dear Sir and/or Madam,

Please be advised that this office was retained to represent Cassandra House with respect to her claims for violations under the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq. (the "FCRA") and other claims related to unlawful credit reporting practices.

On or about February 23, 2023, Ms. House and Synchrony Bank d/b/a Sams Club ("SYNCB") entered into a settlement agreement for the above-referenced account. A recording of the settlement agreement is available upon your request. Pursuant to the terms of the settlement, Ms. House was required to make monthly payments totaling \$697.41 to settle and close her SYNCB account. Ms. House, via her debt settlement representative, timely made the requisite settlement payments.

However, over half a year later, Ms. House's account continues to be negatively reported. In particular, on a requested credit report dated April 19, 2024, Ms. House's account was reported with a status of "Collection/Charge-off", a balance of \$852.00 and a past due balance of \$852.00. The relevant portion of Ms. House's credit report is attached herein for your review. The trade line was inaccurately reported. As evidenced by the enclosed documents, the account was settled in full and has a balance of \$0.00.

Please take notice that this dispute is made pursuant to 15 U.S.C. § 1681i under the FCRA. Therefore, if this inaccuracy is not corrected within thirty (30) days, we will pursue further legal process on behalf of our client.

Thank you for your prompt attention to this important matter.

Very truly yours,

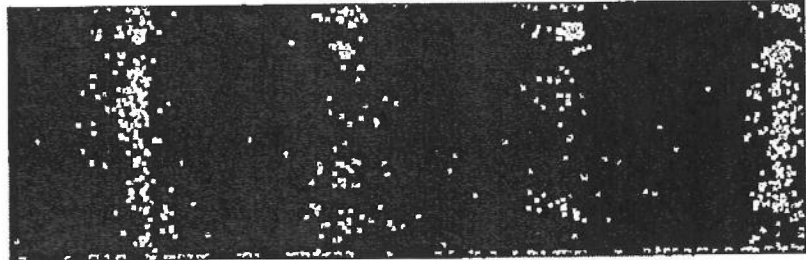
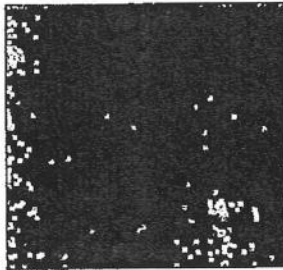
Caroline Zak  
Paralegal  
The Law Offices of Robert S. Gitmeid  
& Associates, PLLC  
[Caroline.Z@gitmeidlaw.com](mailto:Caroline.Z@gitmeidlaw.com)  
(866) 249-1137



## Credit report

Provided by EQUUS

Report date: Apr 19, 2024



## Personal info

Reported names

Cassandra House

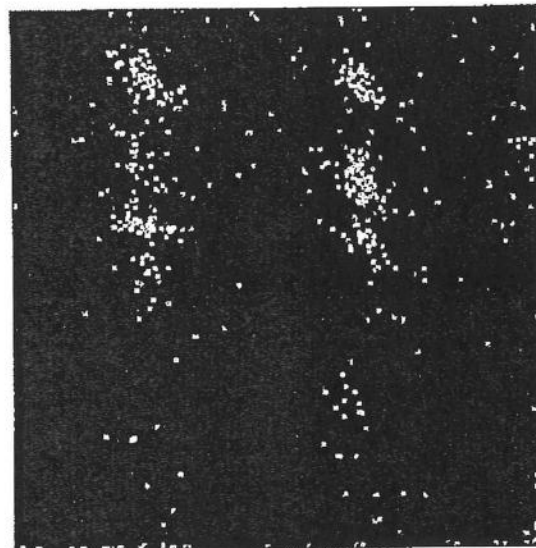
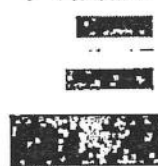
Addresses

Date reported

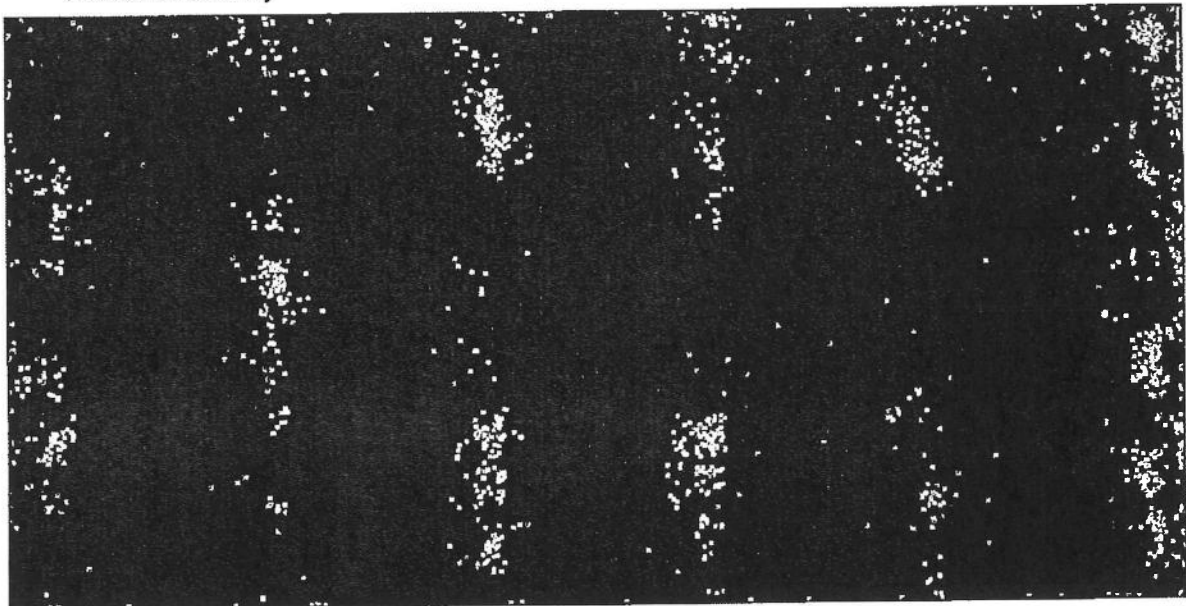
DOB

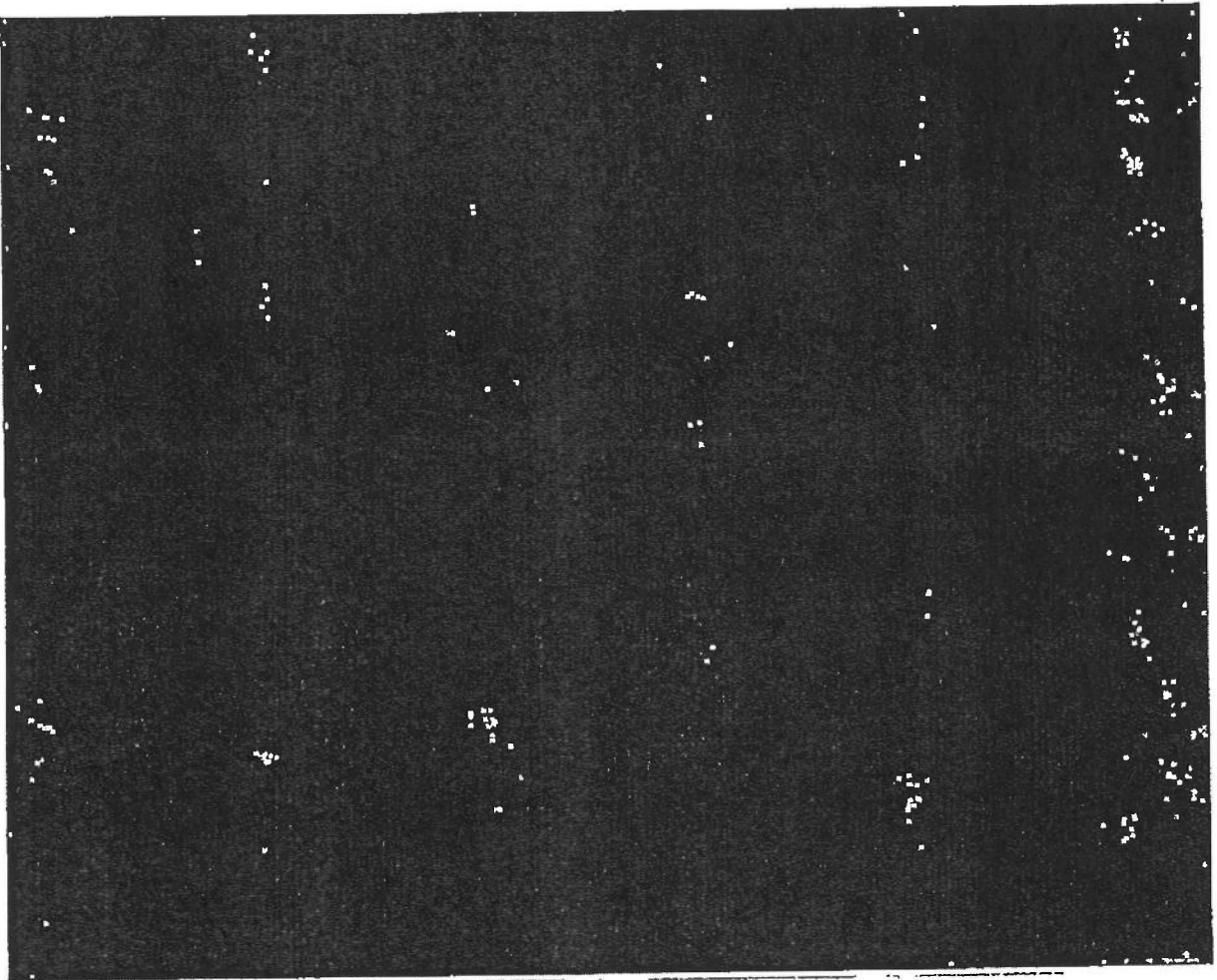
SSN

Employment info



## Account summary





SYNCO/SAMS CLUB  
Reported Mar 11, 2024

\$852.00  
Closed

#### Overview

Balance: \$852.00

#### Payment history

Monthly Payment Amount

Current Payment Status

Amount Past Due

Collection/Charge-off

\$852.00

#### Account details

Account Number 2896

Account Status Charge Off

Open Date

Last Activity

Type Charge Account

Responsibility Individual

Remarks Account Closed At Consumer's Request, Charged Off Account

Times 30/60/90 Days Late 1/1/3

Months Reviewed 40

Term Source Type

High Balance

High Credit \$1,200.00

#### Creditor Information

SYNCO/SAMS CLUB  
4125 WINDWARD PLAZA  
ALPHARETTA, GA 30005  
MAIL ONLY

# EXHIBIT C



## Credit report

TransUnion Equifax Experian **All bureaus**

Bureau

TransUnion

**EQUIFAX**

**experian**

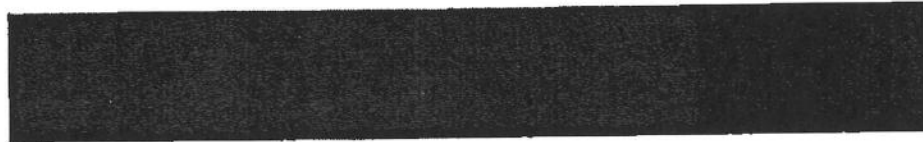


Report date

Jul 26, 2024

Jul 26, 2024

Jul 26, 2024



## Personal Info

Reported names

Cassandra House

Cassandra House

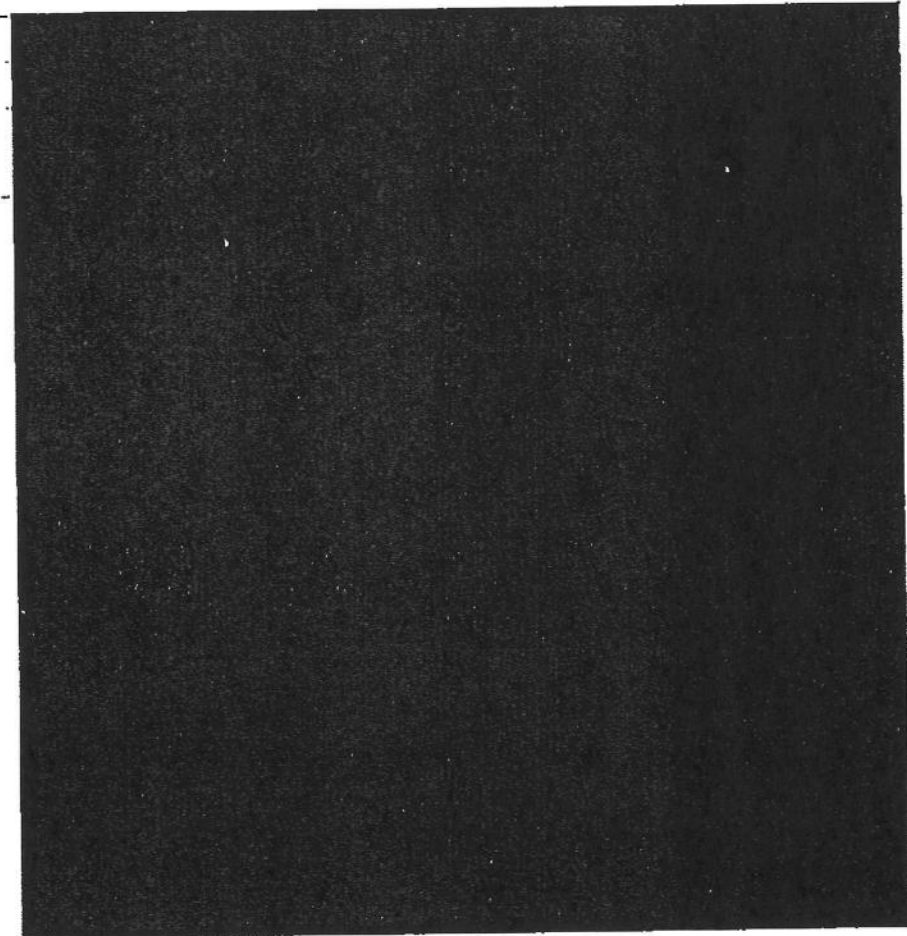
Cassandra House

DOB

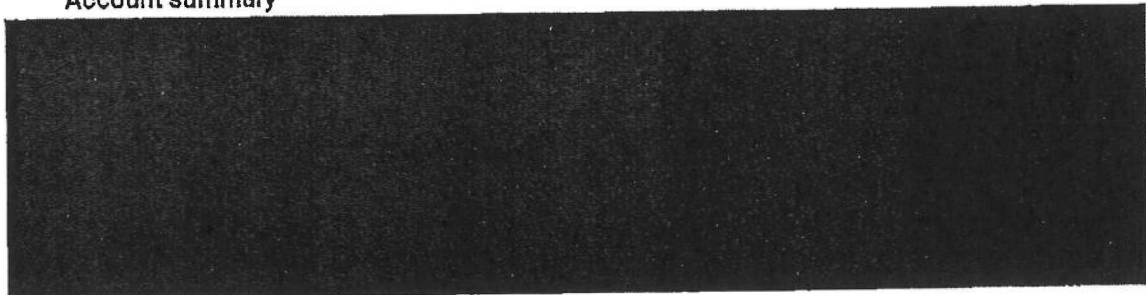
SSN

Employment info

Addresses



## Account summary



Hide Details

Jun 30, 2024 \$852.00  
SYHCB/SA/MS CLUB

## Account details

Account Number [REDACTED] XXXX  
Date Opened Nov 9, 2020  
Last Activity May 1, 2024  
Original Creditor  
Monthly Payment \$0.00  
Term Source Type  
Current Rating Collection/Charge-off  
Status Charge Off  
Type Individual  
High Balance  
Unpaid Balance \$852.00  
Highest Adverse Rating Collection/Charge-off  
Most Recent Adverse Rating No Data Available  
Comments

## Account details

You've Made 11 % Of Payments For This Account On Time.

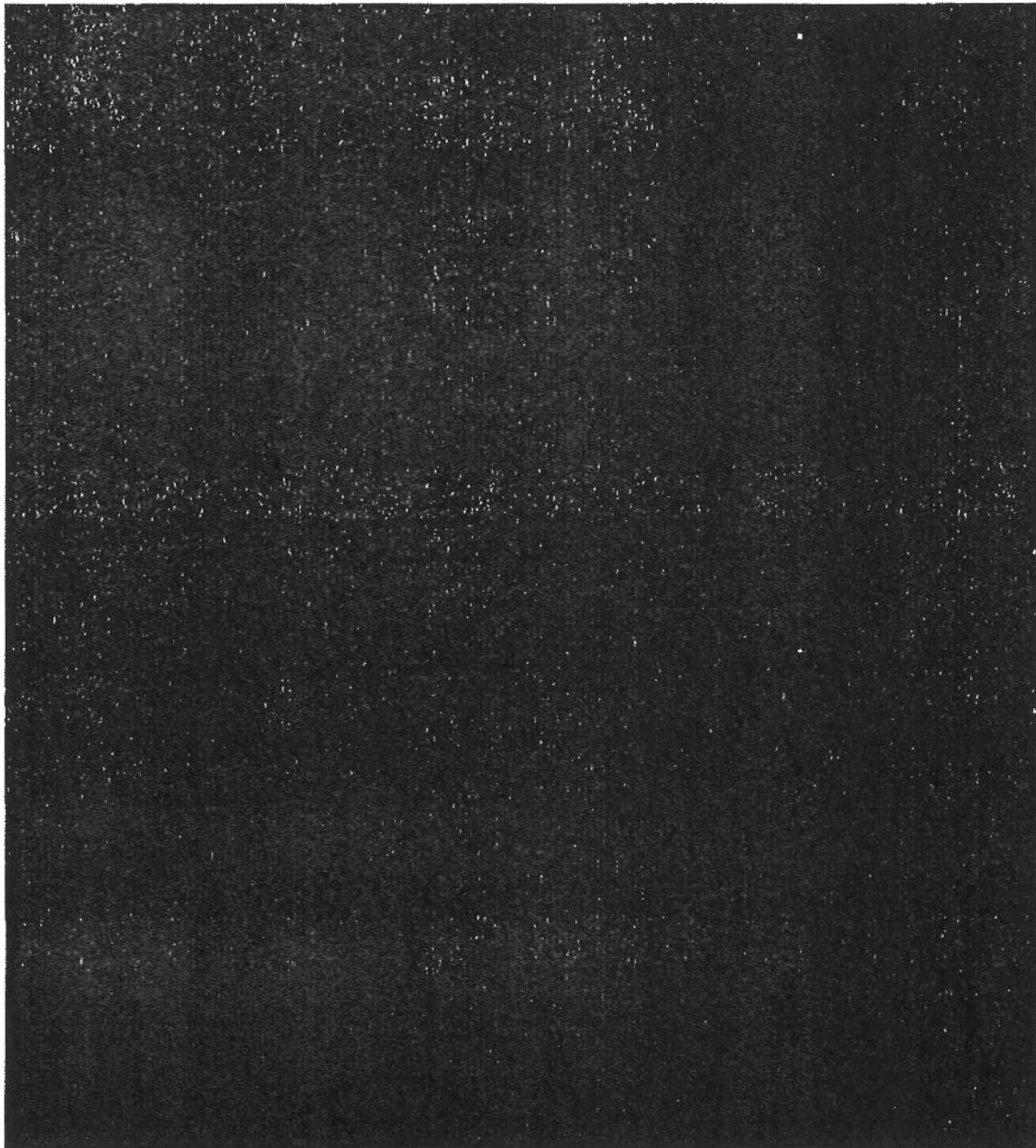
	Jan	Feb	Mar	Apr	May	Jun
2024	CC	CC	CC	CC	CC	
	Jul	Aug	Sep	Oct	Nov	Dec
2023	CC	CC	CC	CC	CC	CC
	CC	CC	CC	CC	CC	CC
2022	Jan	Feb	Mar	Apr	May	Jun
	120	CC	CC	CC	CC	CC
	CC	CC	CC	CC	CC	CC
2021	Jan	Feb	Mar	Apr	May	Jun
	CC	CC	CC	CC	CC	CC
	CC	CC	CC	CC	CC	CC
2020	Jan	Feb	Mar	Apr	May	Jun
	CC	CC	CC	CC	CC	CC
	CC	CC	CC	CC	CC	CC



☐ Paid on time  
☐ 30 days past due  
☐ 60 days past due  
☐ 90 days past due  
☐ 120 days past due  
☐ 150 days past due  
☐ Bankruptcy  
☐ Repossession or foreclosure  
☐ Collection or charge off  
☐ Voluntary surrender  
☐ No data available

Collection agency  
SYNCR/SALIS CLUB  
4125 WINDWARD PLAZA  
ALPHARETTA, GA 30005  
MAIL ONLY

Account ID  
3601e0a0202a22fcb26453e81600949d



FILED by Macomb County Circuit Court  
8/28/2024

2024-003364-CZ  
HOUSE, CASSANDRA VS. SYNCHRONY BANK ET AL.

STATE OF MICHIGAN JUDICIAL DISTRICT 16TH JUDICIAL CIRCUIT MACOMB COUNTY		JURY DEMAND	CASE NO. Case Type: CZ Case No.: 2024-003364-CZ
Court address Macomb County Circuit Court, 40 N Main Street, Mt. Clemens, MI 48043			Court telephone no. (586) 469-7171
Plaintiff(s) name(s) Cassandra House	v	Defendant(s) name(s) Synchrony Bank, et al.	
Plaintiff's address and telephone no. or attorney name, bar no., address, and telephone no. Law Offices of Robert S. Gitmeid & Assoc., PLLC Jennifer Paillon, Esq. (P80284) 30790 Valley Drive, Farmington Hills, MI 48334 Tel: (734) 904-9522		Defendant's address and telephone no. or attorney name, bar no., address, and telephone no. Synchrony Bank 170 W Election Rd, Ste 125 Draper, UT 84020	
<input type="checkbox"/> Probate In the matter of _____ <input type="checkbox"/> Juvenile In the matter of _____			

1. I demand a jury trial.

08/08/2024

Date

/s/ Jennifer Paillon

Signature

Second Defendant:

Equifax Information Services, LLC  
1550 Peachtree Street N.W.  
Atlanta, GA 30309  
Tel: (888) 202-4025

Approved, SCAO  
Form MC 22, Rev. 4/19  
MCL 600.857(3), MCL 600.2529(1)(c),  
MCR 2.508, MCR 2.509, MCR 3.911

Form Distribution:  
Original - Court  
1st copy - Plaintiff/Petitioner  
2nd copy - Defendant/Respondent

# EXHIBIT B



FILED by Macomb County Circuit Court

9/5/2024 4:48:07 PM


Service, Submitted, and File  
Approved, SCAOOriginal - Court  
1st copy - Defendant

2024-003364-CZ

HOUSE, CASSANDRA VS. SYNCHRONY BANK ET AL.

2nd copy - Plaintiff

3rd copy - Return

<b>STATE OF MICHIGAN</b> JUDICIAL DISTRICT 16TH JUDICIAL CIRCUIT MACOMB COUNTY		<b>SUMMONS</b>	<b>CASE NO.</b> Case No.: 2024-003364-CZ Case Type: CZ
Court address Macomb County Circuit Court, 40 N Main Street, Mt. Clemens, MI 48043		Court telephone no. (586) 469-7171	
Plaintiff's name, address, and telephone no. Cassandra House 21356 Cunningham Ave. Warren, MI 48091 (313) 918-8419		v	Defendant's name, address, and telephone no. Synchrony Bank 170 W Election Rd, Ste 125 Draper, UT 84020
Plaintiff's attorney, bar no., address, and telephone no. Law Offices of Robert S. Gitmeid & Associates, PLLC Jennifer Paillon, Esq. (P80284) 30790 Valley Drive Farmington Hills, MI 48334 Tel: (734) 904-9522		Date <u>17 Sept</u> Time <u>1:10</u> Served By: <u>[Signature]</u> Process Server/State Investigator Bringham Process Service 801 561-4278 80 E Daybreak Ave Salt Lake City 	

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

**Domestic Relations Case**

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

**Civil Case**

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ \_\_\_\_\_ Court, where

it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

**SUMMONS****NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to file a written answer with the court and serve a copy on the other party or take other lawful action with the court (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date 09/05/2024	Expiration date* 11/27/2024	Court clerk <u>[Signature]</u>
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\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

Summons (3/23)

Case No. 2024-003364-CZ**PROOF OF SERVICE**

**TO PROCESS SERVER:** You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

**CERTIFICATE OF SERVICE / NONSERVICE**

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee	Miles traveled	Fee	
\$		\$	
Incorrect address fee	Miles traveled	Fee	TOTAL FEE
\$		\$	\$

Signature

Name (type or print)

**ACKNOWLEDGMENT OF SERVICE**

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) \_\_\_\_\_ on \_\_\_\_\_  
Date and time

Signature \_\_\_\_\_ on behalf of \_\_\_\_\_

Name (type or print) \_\_\_\_\_



# EXHIBIT C

**STATE OF MICHIGAN  
SIXTEENTH JUDICIAL CIRCUIT  
IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB**

CASSANDRA HOUSE,

Plaintiff,

Case No.: 24-003364-CZ

Hon. James M. Biernat, Jr.

vs.

SYNCHRONY BANK  
and EQUIFAX INFORMATION  
SERVICES, LLC,

Defendants.

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Jennifer Paillon, Esq. (P80284)  
LAW OFFICES OF ROBERT S. GITMEID  
& ASSOCIATES, PLLC  
30790 Valley Drive  
Farmington Hills, MI 48334  
Tel: (734) 904-9522  
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*Attorneys for Plaintiff Cassandra House*

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ALAN J. TAYLOR (P51660)  
SEGAL MCCAMBRIDGE SINGER & MAHONEY  
Attorney for Defendant Synchrony Bank  
29100 Northwestern Hwy., Ste. 240  
Southfield, MI 48034  
(248) 994-0060 / (248) 994-0061 [Fax]  
[ataylor@smsm.com](mailto:ataylor@smsm.com)

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**NOTICE OF FILING OF REMOVAL BY DEFENDANT SYNCHRONY BANK**

Now comes Defendant, Synchrony Bank (“Synchrony”), by and through counsel, filed a Notice of Removal in the above-captioned matter in the United States District Court for the Eastern District of Michigan. A copy of the Notice of Removal is attached hereto as **Exhibit A**. Pursuant to 28 U.S.C. § 1146(d), this Court shall proceed no further unless and until the case is remanded.

Dated: October 1, 2024

BY: 

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Alan J. Taylor (P51660)  
SEGAL MCCAMBRIDGE SINGER & MAHONEY  
Attorney for Defendant Synchrony Bank  
29100 Northwestern Hwy., Ste. 240

Southfield, MI 48034  
(248) 994-0063/ (248) 994-0061 [Fax]  
[ataylor@smsm.com](mailto:ataylor@smsm.com)

**ATTORNEY FOR DEFENDANT  
SYNCHRONY BANK**

**STATE OF MICHIGAN  
SIXTEENTH JUDICIAL CIRCUIT  
IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB**

CASSANDRA HOUSE,

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Hon. James M. Biernat, Jr.

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*Attorneys for Plaintiff Cassandra House*

---

ALAN J. TAYLOR (P51660)  
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[ataylor@smsm.com](mailto:ataylor@smsm.com)

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of NOTICE OF FILING OF REMOVAL was filed with the Court via the MIFile system and served on Plaintiff's counsel via U.S. Mail and email at the above email address and mailing address set forth above on October 1, 2024.

By: 

Grayce Trevino